

February 13, 2003

The Honorable Michael Powell Chairman, Federal Communications Commission 445 12th Street, SW Washington, D.C. 20544

RE: CC Docket No. 01-338, Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers

Dear Chairman Powell:

For several years, I have watched the struggles between providers in the telecommunications arena, trying to balance new and exciting technologies with the personal memory of "the good ol' days." There have been times when the struggles resembled a dance, people in different companies or different fields moving in coordinating steps to do the very best for the general public and business. At other times, the struggle has taken on the appearance of "to the death" combat where any victory to be had went to the last one standing. Each deadline or ruling on these issues has brought these struggles again to the fore.

Such is the case now. A deadline is about to be reached, when certain restrictions within the industry are scheduled to end. Yet, there are moves afoot to extend these deadlines, inflicting penalty to those companies that have abided by these rules and regulations. Those companies have operated in good faith, expecting the rules to remain the same at the end as they were at the beginning.

It is time to let those rules and regulations expire. There are certain reasons for taking this position.

• These rules and regulations have had a harsh impact on the telecommunications industry. There has not been an expansion of capital investment in the field. Stock market value in the industry has simply

- disappeared. And, a large number of jobs, more than 500,000, have been lost during the last three (3) years.
- It is time to unleash the aspect of competition in a field that has not brought savings to the customer. As part of a nonprofit organization, Speech and Language Development Center, we must continually seek out the best service for the least amount of cost. During my five (5) years of employment, we have not seen any cost-reduction where it would have any benefit to us, the consumer.

Speech and Language Development Center has served a unique population in southern California for more than forty-seven (47) years. It is necessary for us to watch our costs, as our reason for being is to provide service to people living with disabilities. Funds have been increasingly difficult to raise, as the economy has retracted and the number of service providers has grown. And, now, with a severe budget crunch at the state level, we are assured that the funds necessary to complete our mission will be reduced even more. Therefore, we must support those means that will provide us with the best service for the lowest price.

It is our conclusion that one important step in that direction can be taken by the Federal Communications Committee if it will dismantle the economically irrational facilities unbundling rules that have a largely negative effect on the entire industry.

Thank you for your consideration of this matter.

Sincerely,

Rav H. Bell

Director of Development

Cay H. Bell

Speech and Language Development Center